

1 RENE L. VALLADARES
Federal Public Defender
2 State Bar No. 11479
HEIDI A. OJEDA
3 Assistant Federal Public Defender
State Bar No. 12223
4 411 E. Bonneville, Ste. 250
Las Vegas, Nevada 89101
5 (702) 388-6577/Phone
(702)388-6261/Fax
6

7 Attorney for Toniquewa Ballard
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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA
11

12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 TONIQUEWA BALLARD,
16 Defendant.
17

Case No. 2:15-cr-195-GMN-CWH

**EMERGENCY STIPULATION TO
MODIFY CONDITIONS OF RELEASE**

18 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,
19 United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for
20 the United States of America, and Heidi A. Ojeda, Assistant Federal Public Defender,
21 counsel for Toniquewa Ballard, that Ms. Ballard's pre-trial release conditions be modified
22 to allow her to return to Las Vegas by September 1, 2015.

23 This Stipulation is entered into for the following reasons:

24 1. On August 3, 2015, the Court released Ms. Ballard on a personal
25 recognizance bond. (*See Minutes of Proceedings (#20).*) On August 25, 2015, the Court
26 granted Ms. Ballard's unopposed motion to allow her to travel to California for the

1 purposes of meeting with her local Social Security Disability advocate. The Court's order
2 allowed her to travel to California from August 27-29, 2015.

3 2. Ms. Ballard arranged with Pre-Trial Services that she would travel to
4 California via bus. Ms. Ballard's mother only had sufficient funds purchased a one-way
5 bus ticket. Ms. Ballard's mother believe that she would be paid on Friday, August 28,
6 2015, and therefore have money to purchase Ms. Ballard's return ticket for Saturday,
7 August 29, 2015. Ms. Ballard's mother however did not get paid, and therefore was unable
8 to purchase a bus ticket for Ms. Ballard to return on August 29, 2015.

9 3. Throughout the weekend, Ms. Ballard attempted to contact her pre-trial
10 services officer and undersigned counsel. First thing on the morning of August 31, 2015,
11 Ms. Ballard contacted undersigned counsel and her pre-trial services officer, explaining
12 the situation. Ms. Ballard was very concerned about not being able to follow the Court's
13 orders.

14 4. Undersigned counsel has spoken with Samira Barlow concerning this
15 matter. Ms. Barlow indicated that Ms. Ballard has been in contact with her concerning
16 her travel difficulties and that she understands Ms. Ballard's situation. Ms. Barlow
17 suggested that undersigned counsel submit this request to continue her stay in California
18 so that Ms. Ballard is not technically in violation of the Court's order.

19 5. The Government has no objection to this requested extension of time to allow
20 Ms. Ballard time to travel back to Las Vegas, Nevada.

21 6. Based upon Ms. Ballard's efforts to consistently communicate with
22 undersigned counsel and pre-trial services and her good faith efforts in attempting to
23 comply with all the conditions of the Court's order, the parties request that the Court

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1 amend its prior order, and order that Ms. Ballard return to Las Vegas, Nevada by
2 September 1, 2015.¹

3 DATED this 31st day of August, 2015

4 RENE L. VALLADARES
5 Federal Public Defender

DANIEL G. BOGDEN
United States of America

6 */s/ Heidi A. Ojeda*
7 By: _____
8 HEIDI A. OJEDA
9 Assistant Federal Public Defender

/s/ Robert Knief
By: _____
ROBERT KNIEF
Assistant United States Attorney

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¹ Last undersigned counsel spoke with Ms. Ballard, she was in the process of attempting to purchase a bus ticket to return to Las Vegas on the afternoon or evening of August 31, 2015. At the time this stipulation was filed, undersigned counsel was unable to confirm, if she was able to purchase that ticket and/or what time she is scheduled to arrive in Las Vegas, Nevada. Out of an abundance of caution, the parties are requesting that the Court order that she return to Las Vegas, Nevada by Tuesday, September 1, 2015. Undersigned counsel for the defendant has spoken with Ms. Barlow concerning this request, and pre-trial services has no opposition to this request.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

v.

TONIQUEWA BALLARD,

Defendant.

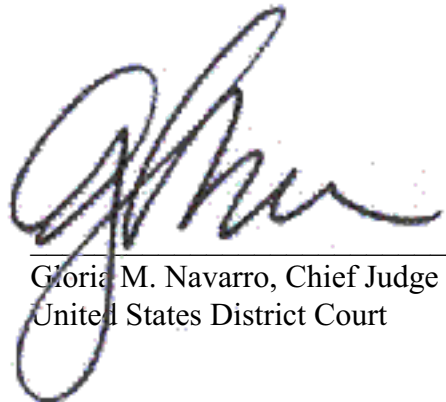
Case No. 2:15-cr-195-GMN-CWH

ORDER

ORDER

IT IS THEREFORE ORDERED that the pretrial release conditions of the defendant be modified to permit Ms. Ballard to return from California to Las Vegas, Nevada by September 1, 2015.

DATED this 31st day of August, 2015



Gloria M. Navarro, Chief Judge
United States District Court

DATED: August 31, 2015